



Safeguarding and Prevention of Sexual Exploitation, Abuse, and Harassment Policy and Code of Conduct

1. Purpose

Inter Pares is a feminist organization working to advance social justice, peace, and equality. This policy aims to safeguard those who come into contact with Inter Pares (as detailed in Section 3 below), ensuring that abuses of power and privilege in the form of sexual exploitation, abuse, and harassment (SEAH) are not tolerated. We acknowledge that this policy, while thorough, may not be exhaustive. Incidents or patterns may be disclosed to Inter Pares that at first glance, do not neatly fall under this policy. We recognize that the implementation of this policy will be contextual, and affirm that it is a living document which will be regularly reviewed.

2. Context

This policy emerged in the context of concerns for the safeguarding of vulnerable people who are the beneficiaries of international development programming, as the public learned of allegations of sexual exploitation, abuse, and harassment against international organizations working in the Global South. While Inter Pares strives to engage in egalitarian relationships with other actors, we recognize that the inherent power imbalances within international development, in which Northern actors bring financial and sociopolitical resources to the South, create a particular vulnerability to SEAH. These sectoral concerns also emerged in tandem with increasing acknowledgement, reflection, and action within society at large regarding the prevalence and normalization of sexual and gender-based violence (SGBV).

This contextual moment prompted Global Affairs Canada (GAC) to develop guidelines on the protection and safeguarding of vulnerable people, including a contractual requirement that organizations holding Contribution Agreements have Codes of Conduct that promote prevention of SEAH (PSEAH), and that GAC be informed of all incidents of SEAH that touch GAC-funded program partners and/or jeopardize the signatory's reputation. Inter Pares' Code of Conduct is contained in this policy (see Section 6 below).

As a feminist organization, Inter Pares goes beyond compliance with our

contractual and legal requirements, and strives to transform the patriarchal attitudes and power imbalances that undergird SEAH and all forms of gender-based violence. Alongside our commitment to promote safeguarding of all people Inter Pares works with from any actions or behaviours that constitute SEAH is our equally strong commitment to globalize equality.

In addition to being a key pillar of feminist action, protection from violence against women is a matter of customary international law, meaning that no state can derogate this obligation in times of conflict or under any other circumstance. It is the strongest form of legal obligation, placing protection against gender-based violence alongside prevention of torture and slavery. In particular, the principles enshrined in the *Convention on the Elimination of All Forms of Discrimination Against Women* (CEDAW) provide a legally binding framework for States on women's rights and violence against women. By referencing this international human rights law context in our policy framework, Inter Pares likewise signals its intention to demonstrate steadfast adherence to these principles of protection from harm in its social justice and human rights work.

3. Scope of Policy

Direct responsibility to respond

Given Inter Pares' contractual obligations to GAC, as well as its ethical obligations to counterparts and vulnerable communities, Inter Pares has a direct responsibility to respond to complaints against

- Inter Pares' paid representatives (staff, contractors, consultants)
- Inter Pares' unpaid representatives (Board members and volunteers)
- Representatives of counterparts that receive funds raised by Inter Pares, either directly or indirectly through an intermediary (see Section 5 below for definitions of direct and indirect counterparts)
- Representatives of Inter Pares' counterparts and collaborators, where there is not a funding relationship with the institution or individual, but the relationship is significant or public enough that Inter Pares' reputation and/or programming would be jeopardized by complaints of SEAH

Inter Pares also has a direct responsibility to safeguard its representatives. This includes a legal obligation towards its staff, as enshrined in Ontario's *Occupational Health and Safety Act*, which aims to protect workers from harassment and violence. This legal obligation is upheld by **Inter Pares' harassment policy** and **Inter Pares' workplace violence policy**, which specifically state the principles, policies and core procedures that uphold the prevention of any sexual exploitation and abuse of persons working for Inter Pares, paid or unpaid (staff, Board members, volunteers), by any actor, in all contexts. In PSEAH cases where the

complainant is a staff member, Board member, or volunteer, Inter Pares' workplace policies and procedures on harassment and violence thus apply. The procedural approach outlined in the present policy will be applied in the case of other complainants.

The primary goal of this current policy is thus for Inter Pares to maintain safe and equitable work environments in its work with counterparts and collaborators. Ideally, safeguarding cultures and measures within counterpart organizations (see Section 7 below) would offer the first point of recourse for complaints against those organizations' representatives. In the absence of such mechanisms or of comfort in invoking them, or out of a complainant's view that Inter Pares "ought to know," we recognize that complaints may come to Inter Pares instead. This present policy sets out our institutional response in such situations, and also covers complaints raised against Inter Pares' representatives.

Indirect responsibility to respond

Inter Pares may receive complaints of sexual violence against members of the Inter Pares community that do not fall into the above outlines of direct responsibility. Given the different nature of these relationships to Inter Pares, the complaint resolution approaches outlined below would not be appropriate. As feminists, however, we refuse to ignore complaints of sexual violence and thus contribute to its normalization and acceptance. Recognizing the crucial role in the healing journey for a complainant that a supportive first response to disclosure plays, Inter Pares will offer validation and emotional support to complainants in these situations as best we can, and immediate measures if possible and appropriate. Inter Pares may determine, independent of a complaint resolution process, that the complaint itself is sufficient cause to alter our relationship with the respondent individual or agency, including possible severance of the relationship.

4. Principles

The following principles will guide Inter Pares in upholding its responsibility to safeguard and prevent sexual exploitation, abuse, and harassment:

- Inter Pares does not tolerate sexual or gender-based violence or sexual harassment or exploitation. Inter Pares views these as violations of human rights, in line with understandings comprised through international human rights instruments, and as inherently connected to inequality and power imbalances.
- Inter Pares recognizes that, while those most affected by SGBV are lesbian, gay, bisexual, transgender, and two-spirit people (LGBT2) and cisgender heterosexual women and girls, cisgender heterosexual men and boys can also be targeted. The harmful consequences of SGBV can be magnified for members

of social groups who experience other grounds of discrimination or marginalization on the basis of Indigeneity, race, age, ability, religion & class.

- Inter Pares recognizes that people who have experienced SEAH do not always immediately act upon it. Disclosures may come months or years after the incident. If a person does not object to inappropriate behaviour at the time it happens, it does not mean that they consented. It may be difficult for the offended person to object, especially if the aggressor is in a position of authority.
- Inter Pares affirms that there is no one “right way” to react to situations of violence, harassment, or exploitation, and will not pass judgement on survivors’ responses or coping/healing strategies.
- Inter Pares commits to responding promptly and seriously to all complaints in a manner that is trauma-informed, transparent, and clear, thereby supporting survivors’ agency and control and promoting safety and well-being.
- Inter Pares recognizes that SEAH inflicts harm on those whom the international cooperation community are obliged to protect, as well as jeopardizing the credibility of all of the community’s members.
- When SEAH involves the perpetration of (a) crime(s), and the adult survivor chooses to prosecute, then Inter Pares will cooperate with any police or legal proceedings as required.
- Should Inter Pares receive complaints involving acts against an underage minor (below the local age of consent¹), Inter Pares will notify relevant child welfare authorities immediately.
- A person who has experienced sexual violence can access other legal processes at any time, including criminal (reporting to the police), civil, criminal injuries, professional regulatory (if applicable), or human rights processes.
- Inter Pares does not tolerate any retaliation or reprisals against survivors or complainants.
- Inter Pares affirms the importance of working to promote the equality of all persons and of transforming patriarchal attitudes and dismantling patriarchal power structures in order to truly address the roots of SEAH.

5. Definitions

Relationships to Inter Pares:

Staff members: individuals based at Inter Pares’ office who receive salary or compensation directly from Inter Pares.

¹ The legal age of consent in Canada is 16, and Canadians are legally obliged to report abuse against children who are below this age. Canadian child protection authorities can also receive complaints for children aged 16 & 17, though there is not a legal obligation to report such situations. The same reporting obligation may not exist in other countries, but Inter Pares representatives will behave as if they do, and contact any relevant child welfare authorities who will receive and address complaints.

Contractors and consultants: individuals who are financially compensated for time-bound work that includes representing Inter Pares or acting on its behalf.

Board members: all members of Inter Pares' Board of Directors, elected at Inter Pares' Annual General Meeting or from time-to-time in accordance with its by-laws.

General members: individuals, including current and former staff and Board members, who pay an annual membership fee to Inter Pares and are therefore entitled to receive notice of, attend, and vote at Inter Pares' Annual General Meeting. New members are ratified at Inter Pares' Annual General Meeting in accordance with its by-laws.

Volunteers: Inter Pares' non-Board volunteers, who are contributing their unpaid time towards institutional projects and needs.

Collaborators: individuals who are working with Inter Pares staff towards a common goal, whether as individuals or on behalf of a counterpart.

Counterparts: all organizations in a collaborative relationship with Inter Pares and/or receiving funds that Inter Pares has raised from private and public sources. This includes

- *direct counterparts:* organizations directly receiving funds from and/or collaborating with Inter Pares
- *indirect counterparts:* organizations receiving funds and participating in Inter Pares programming, but where the funding relationship is mediated through a direct counterpart
- *coalitions and umbrella organizations:* informal or formal associations that bring together member organizations (including Inter Pares)

Concepts related to sexual violence:

Sexual and gender-based violence: any act targeting a person's sexuality, gender, or gender expression, whether the act is physical or psychological in nature, that is committed, threatened or attempted against a person without that person's consent, including *Criminal Code* offences of sexual assault, indecent exposure, voyeurism, and non-consensual distribution of sexual/intimate images. Sexual violence also includes sexual harassment and stalking, cyber harassment, and cyber stalking of a sexual nature. Sexual violence can take place through any form or means of communication (e.g. online, social media, verbal, written, visual, or through a third party).

Sexual exploitation: the exchange of money, shelter, food, or other goods for sex or

sexual favours from someone in a vulnerable position, or profiting from such exchanges.

Sexual abuse: threatening, forcing, or coercing someone to have sex or provide sexual favours under unequal or forced conditions.

Sexual harassment: unwelcome or unwanted sexual conduct or comment(s) directed at an individual when that person reasonably knows or ought to know that the attention is unwanted or unwelcome. Sexual harassment may also consist of unwelcome or unwanted remarks based on gender which are not of a sexual nature but which are demeaning, such as derogatory gender-based jokes or comments.

Consent: in this context means the ongoing and voluntary agreement to engage in sexual activity and to continue to engage in the sexual activity. Consent means that all persons involved demonstrate through words or actions, on an ongoing basis, that they freely, knowledgeably, and mutually agree to participate in the sexual activity. There is no consent where one person abuses a position of trust, power, or authority over another person, including when one person is an underage minor.

Terms used in this policy:

Survivor: an individual who has experienced sexual violence, has disclosed an experience of sexual violence, or identifies as a survivor.

Complaint: the sharing of information or suspicion regarding acts of SEAH by a member of the Inter Pares community.

Complainant: a person who has chosen to initiate a complaint that alleges that a member of the Inter Pares community has breached this policy. This person may be a survivor, a witness, or a third person with knowledge of the substance of the complaint.

Respondent: a person who is alleged to have engaged in behaviour that is in breach of this policy.

PSEAH lead: an Inter Pares staff member or Board member who is responsible for implementation of this policy. At any given time, Inter Pares will have two staff PSEAH leads who will receive and respond to SEAH complaints, as well as monitor and participate in sectoral conversations about preventing and responding to SEAH. In addition, Inter Pares will have one Board PSEAH lead who will receive SEAH complaints against staff and Board members. All PSEAH leads will be women. The names and contact information of the current PSEAH leads can be found online at www.interpares.ca/complaints.

6. Code of conduct

The following Code of Conduct outlines the behaviours and actions that Inter Pares expects of all of its representatives. Any breach of the Code of Conduct is a violation of this policy and will receive the same response as a PSEAH complaint (as detailed in Section 9 below).

Staff and Board members

- Staff and Board members should always strive to treat all persons with respect and courtesy in accordance with generally understood international and national conventions and standards of behaviour.
- Staff and Board members should never intentionally commit any act or omission that would knowingly result in physical, sexual, or psychological harm, including gender-based violence, to other staff and Board members, volunteers, or collaborators.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of the child is not a defense.
- Inter Pares recognizes the rights of sex workers and appreciates that many individuals base their livelihoods on transactional sex (the exchange of money, employment, goods, or services for sex or sexual favours) for a variety of reasons. Nevertheless, for all the reasons outlined in Sections 2 and 4, Inter Pares expects that its staff and Board members will not engage in transactional sex when representing Inter Pares while travelling for work in the Global South.
- While collaboration can foster intimacy, Inter Pares discourages staff and Board members from engaging in romantic or sexual relationships with collaborators in situations where the person or their organization is in a perceived or real subordinate power relationship with Inter Pares (e.g., reliant on Inter Pares for funding, access to networks, or political influence). Should such a relationship develop, the staff or Board member should disclose it to their colleagues, so that appropriate steps can be taken to avoid a real or perceived conflict of interest or exploitation (e.g., ensure that the staff member does not make financial or programmatic decisions that benefit the organization in question). In the case of staff, it should be disclosed to the co-management team; in the case of Board members, it should be disclosed to the Chair and to program staff who relate to the individual and/or organization in question. If such a relationship is not forthrightly disclosed, the presumption will be that it is exploitative.
- Inter Pares also strongly discourages staff and Board members from engaging in romantic or sexual relationships with members of communities in the Global South that directly benefit from the work of organizations that are supported by or collaborate with Inter Pares. Should such a relationship develop, the staff or Board

member should disclose it to their colleagues as outlined above, so that appropriate steps can be taken to avoid a real or perceived conflict of interest or exploitation. If such a relationship is not forthrightly disclosed, the presumption will be that it is exploitative.

- All staff and Board members have a responsibility to communicate SEAH concerns or suspicions immediately to a PSEAH lead.

Volunteers, consultants, and contractors

- Volunteers, consultants, and contractors, when representing Inter Pares or acting on its behalf, should always strive to treat all persons with respect and courtesy in accordance with generally understood international and national conventions and standards of behaviour.
- Volunteers, consultants, and contractors should never intentionally commit any act or omission that would knowingly result in physical, sexual, or psychological harm, including gender-based violence to other volunteers, consultants, or contractors, to staff or Board members, or to those who directly benefit from Inter Pares' work.
- All volunteers, consultants, and contractors have a responsibility to communicate SEAH concerns or suspicions immediately to a PSEAH lead.

7. Preventing sexual violence

Program interventions

- Eradicating inequality, including gender-based violence and inequality, is crucial to the eradication of the root causes of SEAH, and is integral to all our programming work. Please see Inter Pares' website for more details.
- Inter Pares staff will use this policy to prompt conversations with counterparts regarding power imbalances and steps taken to address SEAH within their own institution, programmatic relationships, contractual relationships, and general circles of influence.

Human resources interventions

- Staff and Board members are encouraged to regularly reflect on their sociopolitical location and their power and privilege, and the impact that these have on their relationships within Inter Pares and those they maintain on behalf of Inter Pares.
- Inter Pares will assign two staff people and a Board member as PSEAH leads. The leads will monitor and participate in sectoral conversations on PSEAH, and direct internal capacity-building and policy development as feasible and needed.
- Inter Pares will continue to maintain its goal of having a minimum of 50% cis and trans women, trans men, and/or non-binary people on staff. We acknowledge that people of all genders are capable of SEAH; however, statistically, most incidences of

SEAH are committed by cisgender men. Reducing the risk of SEAH is not the goal of this target, but it is a byproduct.

- Inter Pares will continue to recruit feminists of all genders for its staff team and Board of Directors. Such individuals should bring a deep understanding of inequality and a commitment to its eradication, including fighting SEAH.
- When conducting reference checks for hiring candidates, Inter Pares' list of due diligence questions will include a question on PSEAH.

8. Making a complaint

Individuals are encouraged to make complaints confidentially to one or both of the two staff PSEAH leads in person, by phone, or in writing. The leads can provide information on options following a disclosure, and coordinate accommodations and supports as required. However, we recognize that people tend to disclose traumatic information in the context of relationships of trust, often when an opportune moment presents itself. Therefore, all staff members will be trained to receive complaints, in addition to the PSEAH leads.

If a survivor/complainant has signaled the desire to complain (but has not yet disclosed any information) to a staff member who does not wish to be the one to receive the complaint, the staff member should immediately express their preference that the disclosure be made to a PSEAH lead instead. If the disclosure has already begun, or if the complainant is hesitant to confide in a different person, then the staff member should proceed with receiving the complaint. As part of "listening and supporting" (see Section 9.A below), they should indicate that follow-up will be transferred a PSEAH lead, at which point the staff member will remove themselves from the process.

Anonymous or confidential complaints of SEAH can be submitted by email to:

- One or both of the staff PSEAH leads, by emailing complaints@interpares.ca
- The Board PSEAH lead (if the respondent is a staff or Board member), by emailing complaints-board@interpares.ca

Guidance, including the names and contact information of the current PSEAH leads, is available online at www.interpares.ca/complaints.

9. Responding to PSEAH complaints

Inter Pares commits to ensuring an organizational culture in which complaints are taken seriously and acted upon.

It is not necessary to have proof to support a concern in order to make a complaint.

If an individual feels uncomfortable with something seen or heard that may indicate a breach of the policy, this is sufficient cause to come forward.

Survivors/complainants should feel that they are safe to come forward, that they are listened to, and that action is taken.

A. Listening and supporting

When complaints are received from an identifiable complainant, Inter Pares will respond by:

- Offering validation and encouragement
- Inquiring about the survivor's immediate safety and well-being, and exploring whether there are ways in which Inter Pares can reasonably and appropriately help in this regard
- Offering confidential psychosocial support to the survivor which may include a financial contribution towards such support, or guidance towards accessible support, if appropriate
- Explaining and exploring options for resolving the complaint, if it falls under Inter Pares' direct responsibility

Sometimes, survivors or third parties make complaints out of the desire to disclose to someone, perhaps to Inter Pares specifically, and are not interested in pursuing a resolution of a complaint. As much as possible, Inter Pares will respect this wish by only engaging through the above approaches. Only the person who received the complaint and the designated PSEAH lead will be familiar with the specific details of the complaint; other people within Inter Pares will be on a need-to-know basis about the existence of the complaint, with the agreement of the survivor/complainant.

Every effort will be made to establish a path forward that respects the survivor/complainant's wishes and agency. However, it is possible that Inter Pares, based on the nature of the complaint, will decide that it is of significant institutional concern and requires formal resolution, regardless of whether the survivor/complainant prefers this path. Factors considered in this decision include whether there is a pattern of events or a single serious incident, whether the disclosure indicates an unsafe institutional environment, and the scale/nature of the programmatic relationship with the individual(s) or organization(s) in question. In such an instance, all reasonable efforts will be made to protect the survivor/complainant's anonymity if so desired.

B. Immediate measures

While complaints are being processed, Inter Pares will take immediate measures. Immediate measures are not sanctions, as no findings have yet been reached. The

intention is to minimize harm and institutional liability in the context of Inter Pares' relationship with the respondent, or with the institution that is responsible for the respondent.

These steps can be identified by the designated PSEAH lead, in consultation with the person who received the disclosure, as well as with legal counsel in the case of staff respondents. The PSEAH lead will coordinate or ensure their implementation.

Immediate measures may include the following:

- If the respondent is an Inter Pares representative, they will be removed immediately from situations that would impose contact with a survivor, that would enable the respondent to take decisions that affect the survivor, and/or that would enable similar acts to take place.
- If the respondent is a staff member, they may be suspended with pay.
- If the respondent is with a counterpart organization, all active collaboration will be paused.
- If the respondent is with a counterpart organization that receives funds from Inter Pares, transfer of further funds may be paused.
- Other appropriate steps may be identified that are not captured above.

Immediate measures will be ended when complaints are resolved, when a counterpart assumes responsibility for resolving a complaint, or when the WT has established that they are no longer needed.

C. Complaints resolution

If our response to a complaint falling under our direct responsibility will go beyond listening and supporting, in accordance with this policy, then a Working Team (WT) will be struck. This will normally include the Inter Pares representative who received the disclosure and one of the two staff PSEAH leads (or the Board PSEAH lead, if a staff or Board member is a respondent). Wherever possible and appropriate, the WT will include one person with a programmatic connection to the survivor/complainant or the respondent; if needed, the representative who received the disclosure should step off and be replaced by the staff member that relates most closely to the complaint parties. Every effort will be made to respect any preference a survivor/complainant may have about WT composition. Only the WT will have access to the specific details of the complaint.

The other parties that should be informed of the existence of the complaint and consulted about Inter Pares' response include:

- The other members of the programming cluster into whose program the complaint parties fall
- A representative of the counterpart in question, if applicable, possible, and

appropriate

If the complaint is against an indirect counterpart, the goal will be to reach consensus with the direct counterpart (who mediates the relationship) on the course of action for treating the complaint. Wherever possible and appropriate, either the direct or indirect counterpart should assume responsibility for resolving the complaint.

Track 1: Informal resolution

Depending on the situation, an informal approach of education and support may be deemed the most appropriate. In this case, the WT and the survivor/complainant will together identify the most suitable person to approach the respondent directly, to discuss the complaint and how to engage in appropriate behaviour moving forward. Follow-up education and support may be identified and offered. This approach will only be taken with the survivor/complainant's consent.

Track 2: Mediated resolution

In appropriate circumstances, where the respondent has accepted responsibility for their actions, either party may wish to resolve the matter through a mediated resolution. This path, which draws upon concepts of restorative justice, requires consent on both sides, and the agreement of the WT. It does not necessarily require face-to-face or in-person interaction between the survivor and the respondent.

A mediated resolution must be facilitated by a person with training appropriate to the seriousness and nature of the allegations and the context of the parties, and with training or experience in gender-based violence, trauma-informed practice, and mediation or counselling. The mediator must not have any conflict of interest in relation to any party involved. The outcome(s) of this process may include an apology letter from the respondent, a written agreement that includes behavioural expectations, an undertaking to engage in counselling and/or education or training (e.g., related to anti-violence, anti-oppression, or consent), or a voluntary agreement by the respondent to appropriate measures (e.g., a change of roles to ensure the respondent is not in a position of authority over the survivor).

If the agreed-upon path forward entails a counterpart organization conducting a mediated resolution, they are required to report an overview of the outcome to Inter Pares, but not include specific details of the resolution.

Track 3: Formal resolution

Inter Pares adopts an investigative (fact-finding) rather than adjudicative (hearing arguments from both sides) model for its formal resolution of complaints.

The following steps should be taken:

- a. **Fact-finding:** An initial information-gathering process will establish the basic details of the complaint and whether it is in need of further investigation. This process should be led by a trained investigator.

The WT and survivor/complainant may still pursue the option of informal or mediated resolution once the investigator's initial fact-finding is complete, rather than proceeding with a full investigation.

- b. **Internal briefing:** Once the initial fact-finding has ascertained details of the complaint, and the WT has a recommended course of action, the WT will inform the rest of the co-management team, the Chair of the Board of Directors, and the Board PSEAH lead if not yet engaged. The details of the complaint will not be shared. Depending on the nature of the situation, the Chair and the Board PSEAH lead will together decide how and when information should be shared with the rest of the Board regarding the complaint.
- c. **Global Affairs Canada briefing:** If the complaint involves GAC-funded institutions, and/or the complaint could jeopardize Inter Pares' reputation, then GAC will be informed within 48 hours of Inter Pares initiating a formal resolution process, using the appropriate reporting channels.
- d. **Investigation:** If the complaint concerns a counterpart (either one of their representatives, or a relationship that they mediate), it is Inter Pares' preference that the counterpart lead an investigation. However, if a) the respondent is an Inter Pares representative, b) there is a lack of capacity or willingness on the part of a counterpart to lead an investigation, or c) Inter Pares is considering serious sanctions, then Inter Pares will assume the responsibility of investigating.

A trained and expert investigator will be engaged to interview witnesses in an in-depth and iterative fashion, and produce a process and outcome that is procedurally fair and rigorous, trauma-informed, and respectful of the rights of all persons involved. The investigator must not have any conflict of interest in relation to any party involved. If Inter Pares is leading the investigation, the WT will liaise with the investigator and manage their contract.

If the interviewees are in another country, every effort will be made to find an

investigator with linguistic and cultural skills that match the situation; failing that, the best locally or regionally available investigator will be engaged, along with an interpreter who would be trusted by witnesses. In certain situations, a Canadian investigator may be deemed the most appropriate option.

- e. **Processing the investigation report:** The investigation report will be sent to the WT, who will share it with only the survivor/complainant and the respondent. The WT will create a brief summary, which they will then share with the rest of the co-management team so as to inform its decision-making. This summary will include the WT's determination, based on the investigator's report, of whether the policy was breached, and recommendations on possible sanctions. The summary will also be shared with the Chair of the Board and the Board PSEAH lead. If the respondent is a Board member, the Chair and Board PSEAH lead will convene the Board of Directors (excepting the respondent) in its decision-making.
- f. **Post-mortem:** The receipt of a complaint will trigger a review of this policy (as per Section 13, below), once the complaint is resolved. Complaints against Inter Pares representatives will also trigger a review of institutional policies, procedures, and processes, to analyze how the complaint arose and extract institutional lessons to be learned. If GAC was briefed, then the WT will update related officials as to steps taken.

Refusal on the part of a counterpart organization to participate or cooperate with an investigation will be considered a major breach of this policy and invite serious sanctions.

Confidentiality

While an investigation is ongoing, the fewest number of people possible will be apprised of the specific details of the complaint, and every effort will be made to protect the privacy of all complainants, survivors, and respondents. While Inter Pares cannot guarantee complete confidentiality, information about complaints and investigations shall be limited to individuals on a need-to-know basis.

During and after an investigation, any person who has knowledge of a complaint must respect the sensitivity of the matter and agreed-upon confidentiality. Inter Pares will not reveal a survivor/complainant's name, personal details, or specific details of the complaints to anyone outside the organization without the survivor/complainant's permission, unless required by law. Should disclosure or complaints involve acts against underage minors (as detailed in Section 4 above), Inter Pares will notify relevant child welfare authorities immediately, even if confidentiality was requested by the complainant/survivor.

10. Sanctions and Other Repercussions

For complaints falling outside the direct responsibility of Inter Pares, the impact of a complaint on our relationship with the respondent will still be considered. There may be a decision to sever the relationship, or to continue a relationship with an organization but avoid dealing with one of its representatives. These decisions will be taken by the programmatic staff that relate to the respondent. In the case of a complaint against a general member, any decision to remove them from the Inter Pares membership will be carried out in accordance with Inter Pares' by-laws.

If a formal complaint resolution process affirms that this policy was breached:

- Sanctions against a staff member will be decided by the co-management team, exclusive of the respondent, in consultation with the Board PSEAH lead and legal counsel. Sanctions can include immediate termination of employment.
- Sanctions against a Board member will be decided by the Board of Directors, exclusive of the respondent, in collaboration with the co-management team. Sanctions can include termination of a Board member's mandate.
- Sanctions against a volunteer, consultant, or contractor, including the termination of the relationship, may be determined without a full investigation. The WT will recommend sanctions to the co-management team, who will then take the final decision. The Board Chair and PSEAH lead will be informed of any decision immediately, and will together decide how and when information should be shared with the rest of the Board.
- Sanctions against modestly scaled counterpart relationships and collaborations with individuals,² including the termination of the relationship, can be made without a full investigation. The WT will recommend sanctions to the co-management team who will then take the final decision. The Board Chair and PSEAH lead will be informed of any decision immediately, and will together decide how and when information should be shared with the rest of the Board.
- Sanctions against significant counterpart relationships and collaborations with individuals² will be made by the co-management team as a whole. This step will only be taken after a full investigation, except in the case where the organization refuses to cooperate or participate in the investigation. The Board of Directors will be confidentially apprised immediately of such decisions.
- In the event of disagreement with a direct counterpart about how to respond to a complaint against an indirect counterpart, Inter Pares ultimately reserves the right to determine what relationship it wishes to maintain with the indirect counterpart, including whether it will continue to receive Inter Pares funds.

² Scale of counterpart relationship or collaboration will be evaluated on a case-by-case basis by the WT and the co-management team. Factors that may be considered include, but are not limited to: scale of Inter Pares' financial contribution, staff time and other non-financial resources invested, length of relationship, and public profile and political significance of the relationship or collaboration.

If no sanctions are taken after an investigation, then a written statement should be drawn up to this effect that justifies this decision, no later than two weeks after the decision is taken.

11. External communication regarding sanctions

- The survivor/complainant will be confidentially apprised of sanctions taken against a respondent, or given the written justification for no sanctions.
- Decisions to end a counterpart or collaborative relationship will include an agreement on how to describe the termination of the relationship to stakeholders (e.g., public, funders, other civil society members) who have different informational needs. The general principle of “a need-to-know basis” will be applied, using a feminist lens, in order to find a balance between transparency and confidentiality. The co-management team will agree on messages, in consultation with the Chair.
- Staff or Board members who are approached to provide a reference for an individual whose relationship with Inter Pares was severed as result of a SEAH complaint must indicate that they are not able to provide a reference and that they may not indicate the reason.

12. Implementation of this policy

Inter Pares will take the following internal steps:

- Orient all of its current and new representatives, paid and unpaid, to this policy.
- Train all Inter Pares staff and the Board PSEAH lead on trauma-informed approaches to receiving complaints.

Inter Pares will take the following external steps:

- Ensure that the policy is publicly available on its website, in English and French, alongside a statement regarding our commitment to gender equality and to accountability. A dedicated email address, reporting form, and guidance will be provided for submitting complaints (in English or French).
- Distribute this policy to all of its counterparts, volunteers, contractors, and consultants, and arrange opportunities for discussion to ensure understanding and compliance. We will circulate this policy more broadly as appropriate.
- Ensure that all new written funding agreements with direct counterparts, umbrella organizations, and coalitions include a reference to this policy.
- Ensure that all new written agreements signed with volunteers, contractors, or consultants include a reference to this policy.
- Promote cooperation and mutual learning among Canadian organizations with respect to preventing and responding to SEAH, in particular through one or more of the PSEAH leads engaging with the Canadian Council for International

Cooperation's (CCIC) PSEAH Hub.

13. Monitoring and review

The co-management team is accountable to the Board of Directors for managing and maintaining this policy. The receipt of a complaint will automatically trigger a review once the complaint is resolved; otherwise, the policy will be reviewed every 3 years. All members of the co-management team are accountable for ensuring that organizations receiving funds from Inter Pares understand this policy. Any updates/revisions to this policy must be agreed upon by the co-management team before being submitted to the Board of Directors for feedback, revision, and approval.

14. Acknowledgement of understanding

As a representative of Inter Pares, I acknowledge that I have read and understood this policy. I also agree to adhere to the Code of Conduct that is contained herein.

Name

Date